

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

EXITEXCHANGE CORP.

Plaintiff,

Case No. 2:13-cv-00396-JRG

v.

CONSOLIDATED CASE

FRIENDFINDER NETWORKS, INC., et
al.

Defendants.

**AGREED MOTION TO STAY ALL DEADLINES APPLICABLE TO CLAIMS
INVOLVING DEFENDANTS FRIENDFINDER NETWORKS, INC.,
MANWIN USA, INC., AND MANWIN D.P. CORP.**

Plaintiff ExitExchange Corp. and Defendants FriendFinder Networks, Inc., Manwin USA, Inc., and Manwin D.P. Corp. (collectively, “the Moving Parties”), by and through their undersigned counsel, file this Joint Motion to Stay all deadlines applicable to the claims involving the Moving Parties. The Moving Parties are currently working to prepare and finalize dismissal papers and all preconditions necessary for the filing of dismissal papers. Accordingly, with respect to the claim involving the Moving Parties, the parties respectfully request that the Court stay these proceedings until May 7, 2014, so that the parties can avoid spending time and resources defending or prosecuting the claims in the lawsuit while they work to finalize the dismissal papers and to complete all preconditions necessary for the filing of the dismissal papers. This limited stay is for good cause and so that justice may be served.

Respectfully submitted,

/s/ Andrew W. Stinson

Andrew W. Stinson
State Bar No. 24028013
RAMEY & FLOCK PC

100 East Ferguson, Suite 500
Tyler, Texas 75702
Telephone (903) 597-3301
astinston@rameyflock.com

Frank M. Gasparo (Admitted Pro Hac Vice)
Todd M. Noshier (Admitted Pro Hac Vice)
Venable LLP
1270 Avenue of the Americas
Twenty-Fourth Floor
New York, New York 10020
Telephone: (212) 307-5500
Facsimile: (212) 307-5598
fmgasparo@venable.com
tmnoshier@venable.com

Tamany Vinson Bentz (Admitted Pro Hac Vice)
Venable LLP - Los Angeles
2049 Century Park East, Suite 2100
Los Angeles, CA 90067
Telephone: (310) 229-9900
Facsimile: (310) 229-9901
tjbentz@venable.com

ATTORNEYS FOR DEFENDANT
FRIENDFINDER NETWORKS, INC., MANWIN
USA, INC., AND MANWIN D.P. CORP.

By: /s/ Susan D. Pitchford
Susan D. Pitchford (*Admitted Pro Hac Vice*)
Kevin L. Russell
(*To Be Admitted Pro Hac Vice*)
CHERNOFF VILHAUER LLP
601 SW Second Avenue
Suite 1600
Portland, OR 97204
Telephone: (503) 227-5631
Facsimile: (503) 278-4373
sdp@chernofflaw.com
kevin@chernofflaw.com

S. Calvin Capshaw
State Bar No. 03783900
Elizabeth L. DeRieux
State Bar No. 05770585
Jeffrey D. Rambin

State Bar No. 00791478
CAPSHAWDERIEUX,L.L.P.
114 E. Commerce Ave.
Gladewater, Texas 75647
Telephone: (903) 236-9800
Facsimile: (903) 236-8787
ccapshaw@capshawlaw.com
ederieux@capshawlaw.com
jrambin@capshawlaw.com

ATTORNEYS FOR PLAINTIFF
EXITEXCHANGE, CORP

CERTIFICATE OF SERVICE

The undersigned certifies that on April 8, 2014 a true and correct copy of the foregoing document was served on all attorneys of record who have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Andrew W. Stinson
Andrew W. Stinson